

RUDY

November 21, 2007

Thomasena P Duncan, Esq
General Counsel
Federal Election Commission
Office of General Counsel
999 E Street, N W
Washington, D C 20463

MUR # 5955

Via U S Mail

Re Complaint regarding Possible Campaign Finance Violations

Dear Ms Duncan

I file this complaint as General Counsel to the Rudy Giuliani Presidential Committee, Inc ("RGPC") under 2 U S C section 437g(a)(1). It has come to our attention that the Federal Election Campaign Act of 1971, as amended, may have been violated by Dr Jose Valdez, the former WellPoint, Inc ("WellPoint") Health Care Management Executive, and other individuals named in the attached exhibit.

By letter dated October 25, 2007, Randall Lewis, the Chief Compliance Officer of WellPoint, revealed that five \$2300 contributions to RGPC that were made by WellPoint employees and their spouses were reimbursed by Dr Jose Valdez. See Letter from Randall Lewis to Larry Levy dated October 25, 2007, Exhibit A. According to WellPoint's October 25, 2007 letter, Dr Valdez requested that three WellPoint employees, each of whom reported directly to Dr Valdez during his tenure, make \$2300 contributions to RGPC with the understanding that they would be reimbursed by Dr Valdez. *Id* WellPoint reports that these three employees contributed to RGPC as asked – with two of their spouses making additional \$2300 contributions – and that Dr Valdez reimbursed two of these employees by personal check and the third with cash. *Id*

Upon receipt of WellPoint's October 25, 2007 letter, RGPC immediately commenced an investigation into the circumstances surrounding the five contributions at issue. Our records indicate that Dr Valdez was authorized as a fundraising agent by RGPC in anticipation of a May 1, 2007 fundraising event that was held in Washington, D C for which Dr Valdez was a host. In connection with that event, Dr Valdez collected fourteen contributions including his personal contribution and that of his wife. Other than Dr and Mrs Valdez's contributions and the five contributions made by the WellPoint employees listed in the October 25, 2007 letter, seven

Paid for by the Rudy Giuliani Presidential Committee, Inc

www.JoinRudy2008.com

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2007 NOV 21 AM 10:00

10044273108

RUDY

additional individuals contributed to RGPC through Dr Valdez No other contributions have been collected by Dr Valdez on behalf of RGPC

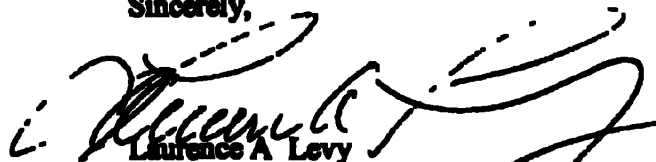
In an abundance of caution, RGPC undertook the following remedial steps

- Dr Valdez's authority as a fundraising agent for RGPC was revoked by letter dated October 30, 2007,
- The contributions made by Dr and Mrs Valdez, together amounting to \$4,600, were refunded under cover of an October 30, 2007 letter,
- The five contributions alleged to have been improperly reimbursed by Dr Valdez were refunded to their respective donors by cover of letters dated October 30, 2007,
- The donors responsible for the seven remaining contributions made through Dr Valdez were contacted, and they have all confirmed that their contributions were made willingly and free of any coercion, and were not reimbursed by Dr Valdez or any other party

RGPC was completely unaware of any possible wrongdoing in connection with the contributions made by and collected by Dr Valdez prior to receipt of WellPoint's October 25, 2007 letter When the propriety of these contributions was called into question by the October 25, 2007 letter, RGPC immediately and thoroughly investigated, and took prompt corrective action RGPC has at all times acted in good faith to abide by all applicable laws, rules and regulations

Please do not hesitate to contact me at 646-943-7804 (telephone) or 646-274-9804 (fax) with your response to this letter or with any questions or concerns My mailing address is 295 Greenwich Street, #356, New York, NY 10007

Sincerely,

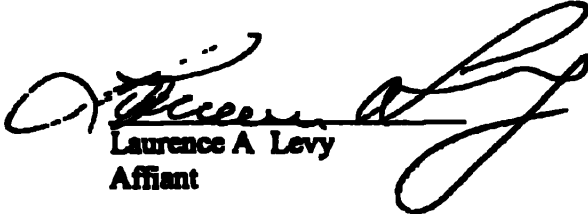

Laurence A. Levy
General Counsel
Rudy Giuliani Presidential Committee, Inc

Paid for by the Rudy Giuliani Presidential Committee, Inc
www.JoinRudy2008.com

10044273109

RUDY

I, Laurence A Levy, hereby affirm that the information provided in the attached complaint is true and correct to the best of my knowledge, information and belief


Laurence A Levy
Affiant

Nov 21, 2007
Date

SWORN to and SUBSCRIBED
before me this 21 day of
November, 2007


NOTARY PUBLIC

DENISE A COLTON
Notary Public, State of New York
No 01CO8136280
Qualified in New York County
Term Expires December 19 2009

Paid for by the Rudy Giuliani Presidential Committee, Inc
www.JoinRudy2008.com

10044273110